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*Attorneys for Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric  
Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REQUEST FOR ENTRY OF ORDER BY  
DEFAULT ON REORGANIZED DEBTORS'  
MOTION FOR ENTRY OF AN ORDER  
(I) APPROVING SETTLEMENTS  
RESOLVING DISPUTES WITH CERTAIN  
INSURERS, AND (II) GRANTING RELATED  
RELIEF**

**[Re: Docket No. 13015]**

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**RELIEF REQUESTED IN THE MOTION**

The Motion seeks entry of an entry of an order: (i) approving the settlements, by and among the Reorganized Debtors and certain of PG&E’s insurance carriers, annexed as Exhibits A and B to the Declaration of Richard W. Slack (the “**Slack Declaration**”) [Docket No. 13016] filed in support of the Motion; and (ii) granting related relief. A proposed order (the “**Proposed Order**”) was attached as Exhibit C to the Slack Declaration.

## NOTICE AND SERVICE

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1. I am an attorney with the firm of Keller Benvenuti Kim LLP, co-counsel for the Reorganized Debtors.

3. This declaration was executed in San Francisco, California.

Dated: October 21, 2022

*Attorneys for Debtors and Reorganized Debtors*